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Via E-mail to [REDACTED] [@cand.uscourts.gov](mailto:[REDACTED]@cand.uscourts.gov)

The Honorable Donna M. Ryu
Chief U.S. Magistrate Judge
United States District Court
1301 Clay Street
Oakland, California 94612

Re: United States v. Goonan, No. 24-70948 MAG

Dear Chief Judge Ryu:

As previewed at Mr. Goonan's initial appearance on July 11, I write to advise the Court that at any detention hearing in this matter, the government's argument for pretrial detention will include a proffer of evidence tending to show that on June 11, 2024, Mr. Goonan arrived on foot on the 12th Street side of the Oakland federal building with a bag containing Molotov cocktails. He threw rocks at the glass facing the street, intending to break a window and toss one or more lit devices into an interior office. As he was throwing rocks at the window,¹ he was interrupted by a protective security officer. Mr. Goonan stopped throwing rocks and moved away from the officer, but as he did so, he placed the bag with Molotov cocktails inside a planter that abuts the 12th Street side of the building and lit it on fire before fleeing.

Particularly given that there is no evidence that Mr. Goonan's actions were aimed specifically at the Court or the judiciary, the government does not believe that Your Honor's presiding over the detention hearing in this case would create an appearance of impropriety.

¹ The damaged window was that of the office of the US Railroad Retirement Board.

Mr. Goonan's counsel has advised that Mr. Goonan intends to waive pretrial detention at the status conference on July 18. Given that intention, Mr. Goonan's position is that Your Honor need not consider or decide this issue until and unless at some future date, the Court reopens the detention hearing pursuant to 18 U.S.C. § 3142(f)(2).

Please let me know if the Court has any additional questions or concerns.

Respectfully submitted,

ISMAIL J. RAMSEY
United States Attorney

/s/ Nikhil Bhagat

NIKHIL BHAGAT
Assistant United States Attorney

cc: Sarah Potter, Esq. (via e-mail)
Provisional Counsel for Casey Goonan